

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

JURY TRIAL DEMANDED

LESLIE MEEHAN,
PLAINTIFF,

v.

C.A. No.:

CHELSEA DIOGO,
DEFENDANT.

COMPLAINT AND DEMAND FOR JURY TRIAL

PARTIES

1. Plaintiff, Leslie Meehan, is a resident of Warwick, County of Kent, State of Rhode Island.
2. Defendant, Chelsea Diogo (“Defendant Diogo”), is a resident of Rehoboth, County of Bristol, Commonwealth of Massachusetts.

JURISDICTION AND VENUE

3. This court has original jurisdiction pursuant to 28 U.S.C. §1332, in that this is a civil action wherein the matter in controversy exceeds the value of \$75,000.00 (exclusive of interest and costs) and is between citizens of different states.
4. Venue is proper in this district pursuant to 28 U.S.C. § 1391(a), since the events giving rise to Plaintiff’s claims occurred or had their effect within this judicial district.

FACTUAL BACKGROUND

The Underlying Motor Vehicle Collision And Injuries

5. Plaintiff re-states and re-alleges paragraphs 1-4 as if fully set forth herein.
6. On or about the December 10, 2021, Defendant Diogo was operating a

motor vehicle on 1 Commerce Way in Seekonk, Massachusetts when her vehicle negligently struck Plaintiff's vehicle from behind.

7. As a result of the tortfeasor's negligence, the Plaintiff suffered personal injuries, and incurred legal damages such as lost wages, pain and suffering, permanent impairment, and medical expenses.

COUNT I
(Negligence)

8. Plaintiff re-states and re-alleges paragraphs 1-7 as if fully set forth herein.

9. Defendant Diogo owed a duty to Plaintiff to operate her vehicle with due care.

10. Defendant Diogo breached her duty by negligently and carelessly operating her vehicle so as to cause it to collide with the Plaintiff's vehicle.

11. As a direct, proximate result of Defendant Diogo's negligence, Plaintiff sustained personal injuries, experienced pain and suffering, both mental and physical, incurred medical expenses and property damage, suffered lost wages and loss of earning capacity, all of which will continue in the future.

WHEREFORE, Plaintiff demands judgment against Defendant for all damages in an amount in excess of \$75,000 plus interest, costs, and reasonable attorney fees and in an amount sufficient to fully compensate her for her injuries.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial-by-jury on all counts and issues so triable.

Plaintiff
Leslie Meehan
By her Attorney,

/s/ Gregory P. Sorbello

Gregory P. Sorbello, Esq. (#6564)
Michael R. Bottaro, Esq. (#7389)
The Bottaro Law Firm LLC
756 Eddy Street
Providence, RI 02903
Tel: (401) 383-5007
Fax: (401) 383-5005

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